

Hon. James L. Robart

Matthew Cunanan, WSBA #42530  
DC Law Group  
12055 15<sup>th</sup> Ave NE, Seattle, WA 98125  
Tel: 206.494.0400  
[matthew@dclglawyers.com](mailto:matthew@dclglawyers.com)

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

BRENT ROTTER,

Plaintiff,

v.

TOP SUN PROCESSING USA LLC,

Defendant.

Case No. 2:22-cv-01341

**STIPULATED JOINT MOTION AND  
[PROPOSED] ORDER TO EXTEND  
DEADLINE TO RESPOND TO  
COMPLAINT**

**NOTE ON MOTION CALENDAR:  
OCTOBER 12, 2022**

**STIPULATED JOINT MOTION**

Plaintiff Brent Rotter, on the one hand, and Defendant Top Sun Processing USA LLC (“Top Sun”) hereby stipulate & jointly agree, subject to Court approval, that the time for Defendant to answer or otherwise respond to the Complaint (Dkt. #3) shall be set as November 23, 2022. This stipulation arises as a result of the following facts and circumstances.

1. The parties have agreed that Defendant will accept service through their counsel effective as of Wednesday, October 12, 2022, and that such defendant will have the time permitted by Fed. R. Civ. P. 4(d)(3), i.e., 60 days for a defendant who waives service, to answer or otherwise respond to the complaint.
2. Accordingly, the parties request that the Court approve this stipulated motion, and order that service on Defendant Top Sun shall be deemed effective as of October 12, 2022, and the deadline for said defendant to answer or otherwise respond to the complaint shall be November 23, 2022.

Respectfully submitted on October 12, 2022,

DC LAW GROUP

By: Matthew Cunanan  
Matthew Cunanan, (WSBA No. 42530)  
[matthew@dclglawyers.com](mailto:matthew@dclglawyers.com)  
12055 15th Ave NE  
Seattle, WA 98125  
Phone: (206) 494.0400

ATTORNEY FOR DEFENDANT  
Top Sun


By: /s/ Conner Spani  
Conner Spani (WSBA No. 58788)  
[Conner.spani@spanilaw.com](mailto:Conner.spani@spanilaw.com)  
PO Box 47162  
Seattle, WA 98146  
Phone: (206) 579-8781

ATTORNEY FOR PLAINTIFF  
Brent Rotter

**[PROPOSED]  
ORDER**

IT IS HEREBY ORDERED that Defendant Top Sun shall be deemed served with the complaint as of October 12, 2022, and that the deadline for said defendant to answer or otherwise respond to Plaintiff Rotter's complaint shall be November 23, 2022.

DATED this 13th day of October, 2022.

  
JAMES L. ROBART  
United States District Judge

**Presented by:**

DC LAW GROUP

By: Matthew Cunanan  
Matthew Cunanan, (WSBA No. 42530)  
[matthew@dclglawyers.com](mailto:matthew@dclglawyers.com)  
12055 15th Ave NE  
Seattle, WA 98125  
Phone: (206) 494.0400

ATTORNEY FOR DEFENDANT  
Top Sun

By: /s/ Conner Spani  
Conner Spani (WSBA No. 58788)  
[Conner.spani@spanilaw.com](mailto:Conner.spani@spanilaw.com)  
PO Box 47162  
Seattle, WA 98146  
Phone: (206) 579-8781

ATTORNEY FOR PLAINTIFF  
Brent Rotter